

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:	Stephen Craig Kent)	
)	
	Debtor.)	Case No. 13-33873-KRH
)	Chapter 13
)	
Address)	
	Stephen Craig Kent)	
	4128 Sprenkle Ln.)	
	Richmond, VA 23228)	
)	
Last four digits of SSN or ITIN:	7793)	

NOTICE OF MOTION TO

Jason M. Krumbein, Esq. has filed papers with this court seeking to Vacate the Dismissal of the Bankruptcy.

Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before 21 DAYS FROM TODAY, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court
U.S. Bankruptcy Court
701 E. Broad St., Suite 4000
Richmond, VA 23219

Jason M. Krumbein, Esq.
Krumbein Consumer Legal Services, Inc.
5310 Markel Road, Suite 102
Richmond, VA 23230

You must also attend a hearing on October 16, 2013 at 10:30 am, before Judge Huennekens, 701 E. Broad St., Rm 5000, Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: September 30, 2013

/s/ Jason M. Krumbein, Esq.
5310 Markel Road, Suite 102
Richmond, VA 23230
VSBN 43538
Counsel for Debtor in Bankruptcy

CERTIFICATE OF SERVICE
See certification in Application Attached hereto

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	Richmond, VA 23228)	
)	
Last four digits of SSN or ITIN:	7793)	

MOTION TO VACATE DISMISSAL

COMES NOW, Krumbein Consumer Legal Services, Inc., counsel for Debtor(s), and pursuant to FRCP 60/FRBP 9024 says as follows:

- 1) This motion is filed pursuant to Fed.R.Bankr.Proc. 9024 and Fed.R.Civ.P. 60.

JURISDICTION, VENUE, CORE PROCEEDING

- 2) This court has jurisdiction pursuant to 28 USC 1441.
- 3) This is the proper venue pursuant 28 USC 1391.
- 4) This is a core proceeding pursuant to 28 USC 157.

PARTIES

- 5) The movants are the Debtors in the above identified case, as defined by the Bankruptcy Code.

FACTS

- 6) Movants filed a Voluntary Petition for Relief in this court on 7/17/2013.
- 7) On September 24, 2013, the Chapter 13 trustee filed a Certification of Failure to Commence Payments.

- 8) Debtor had previously sent the first payment by Money order to the trustee not later than August 15, 2013.
- 9) The money order has not yet been deposited.
- 10) The debtor has complied in all other respects with the requirements of the US Bankruptcy Code, the Federal rules of Bankruptcy Procedure and the Local Rules.

RELIEF REQUESTED

Movants request that the court vacate the dismissal of this case for the reasons stated above.

/s/ Jason M. Krumbein, Esq.
Jason M. Krumbein, Esq. VSBN 43538
Counsel for the Debtor(s) in Bankruptcy
Krumbein Consumer Legal Services, Inc.
5310 Markel Road, Suite 102
Richmond, VA 23230
Tel: 804.303.0204 Fax: 804.303.0209
jkrumbein@krumbeinlaw.com

CERTIFICATE OF SERVICE

I certify that I have this September 30, 2013, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US Trustee, and by regular mail to the to the Debtor and all creditors listed on the attached Service List.

/s/ Jason M. Krumbein, Esq.
Counsel for the Debtor(s) in Bankruptcy

Stephen Craig Kent
4128 Sprengle Ln
Henrico, VA 23228

Applied Card Bank
Attention: Bankruptcy
P.O. Box 15809
Wilmington, DE 19850-5809

Capital One, N.A.
Capital One Bank (USA), NA
PO Box 30285
Salt Lake City, UT 84130

Internal Revenue Service
Centralized Insolvency Ops
PO Box 7346
Phila, PA 19101-7346

Shapiro Brown & Alt
236 Clearfield Avenue
Suite 215
Virginia Beach, VA 23462

The Fitzpatrick Law Group, PC
4118 Leonard Dr.
Suite 200
Fairfax, VA 22030

Titlemax of Virginia, Inc,
RA CT Corporation System
4701 Cox Rd, Suite 301
Glen Allen, VA 23060

Titlemax of Virginia, Inc.
15 BULL STREET
SUITE 200
Savannah, GA 31401

Virginia Department of Tax
PO Box 2156
Richmond, VA 23218-2156

Wells Fargo Home Mortgage, Inc
MAC X2302-04C
One Home Campus
Des Moines, IA 50328

Wells Fargo Bank, NA
Attn: Bankruptcy Dept
3476 Stateview Blvd
MAC#D3347-014
Fort Mill. SC 29715